

DEEPWATER HORIZON MC252

GULF COAST INCIDENT MANAGEMENT TEAM PHASE III RESPONSE ACTIVITIES COMPLETION PLAN

GCIMT UNIFIED COMMAND – STRATEGIC PLANNING

01/19/2012



FOSC Approval:

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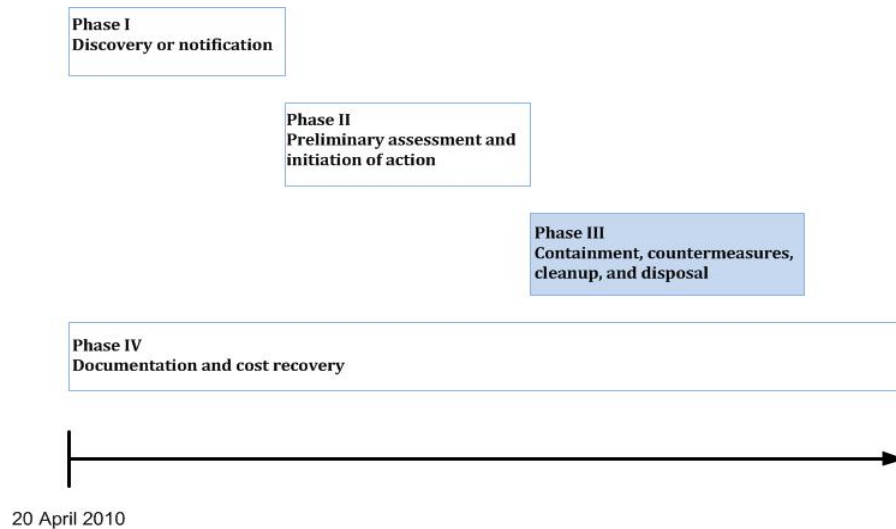
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OPERATIONAL RESPONSE PHASES FOR OIL REMOVAL



1. PURPOSE

The GCIMT Phase III Response Activities Completion Plan has been developed to ensure the Gulf Coast Incident Management Team (GCIMT) priorities and objectives are accomplished as Phase III (containment, countermeasures, cleanup, and disposal)¹ activities are completed and the GCIMT Unified Command² functions are discontinued. In addition, the plan outlines the activities required before the Federal On Scene Coordinator (FOSC),³ in consultation with the Governor or Governors of the affected states, may deem the removal efforts to be complete under 40 C.F.R. 300.320(b), for the Deepwater Horizon (DWH) MC-252 Emergency Oil Spill Response. The FOSC, in consultation with the State On-Scene Coordinators (SOSCs), Federal Trustees,⁴ and BP, as one of the Responsible Parties (RP), will execute remaining Phase III activities and processes in accordance with the Shoreline Clean-Up Completion Plan (SCCP).⁵ Deepwater Horizon Phase IV Documentation and Cost Recovery and traditional United States Coast Guard (USCG) response activities will continue under the FOSC authority. On-going Phase IV activities and non-DWH state and federal response activities in accordance with the National Contingency Plan (NCP) and applicable Area Contingency Plans (ACPs) are beyond the scope of this Plan. The Plan provides guidance for the GCIMT as the organization de-centralizes and active response on MC252 oil impacted shoreline segments⁶ are deemed removal actions complete. As shoreline segments meet SCCP endpoints⁷ and operational requirements decrease, the GCIMT will continue to optimize staffing, as determined appropriate by the Unified Command. Phase III activities will conclude in each affected state (LA, MS, AL, FL) as removal actions are deemed complete. The FOSC, in consultation with the SOSCs, Federal Trustees, and BP, will progressively conclude Phase III response by state and associated federal lands. The GCIMT Phase III Response Activities Completion Plan will be effective upon approval by the FOSC.

¹ Ref National Contingency Plan (NCP) 40 C.F.R. 300.310: Phase III – Containment, countermeasures, cleanup, and disposal

² Ref NCP 40 C.F.R. 300.305(c): “Management structure that brings together the functions of the Federal Government, the state government, and the responsible party to achieve an efficient response, where the FOSC maintains authority.”

³ FOSC authority per 40 C.F.R. 300.120 for the Deepwater Horizon Oil Spill Response

⁴ Ref NCP 40 C.F.R. 300.5: Trustee means: “An official of a federal natural resources management agency designated in subpart G of the NCP or designated state official or Indian tribe...”

⁵ Ref SCCP dated 02 Nov 2011 defines the process steps and endpoints for “removal actions are complete”

⁶ MC252 oil impacted shoreline segments are defined as areas where there is a confirmed impact of MC252 oil. The impacted areas include portions of Louisiana, Mississippi, Alabama, and Florida as determined by the SCAT Maximum Oiling Survey Maps created by the GCIMT using Emergency Response Management Application (ERMA) software.

⁷ Ref SCCP: Shoreline Clean-up Completion Plan Chapter 5 Shoreline Clean-up Endpoints

2. PHASE III OBJECTIVES

1. Provide an organizational structure to implement and complete the SCCP activities, support USCG National Response Center (NRC) report response efforts within the Deepwater Horizon Response Area of Responsibility (AOR),⁸ and continue to optimize GCIMT staffing as Phase III activities progress.
2. Ensure continuity of operations in segments undergoing treatment prescribed by the SCCP to ensure the appropriate shoreline clean-up activities have been accomplished. Phase III treatment of MC252 oil impacted shoreline segments in accordance with the SCCP will continue until removal actions are deemed complete by the FOSC. Activities will be deemed “removal actions are complete”⁹ by the FOSC for segments¹⁰ that have been confirmed as meeting requirements established in the SCCP.
3. Maintain communications and adhere to Incident Command System (ICS) principles, key procedures and internal processes to support Deepwater Horizon Response priorities.
4. Maintain surge resource capabilities to support Phase III activities.

3. CRITICAL PRIORITIES

1. Ensure the continued safety of all response personnel.
2. Direct the conduct of shoreline treatment as required in support of Phase III operations and GCIMT Command Objectives. Maintain appropriate command and control to ensure safe, thorough, and efficient operations. Meetings of the Unified Command will continue to include FOSC/FOSCR, SOSCs, Federal Trustees, BP IC and General Staff as necessary to ensure the coordination of IAPs, evaluate operational conditions, analyze NRC report data, and support the SCCP process and procedures to ensure all Phase III activities are effectively completed.¹¹
3. Coordinate the timely response and investigation to NRC reports of possible MC252 oil on shoreline segments within the Area of Responsibility (AOR).

⁸ The Area of Responsibility (AOR) is defined as any surveyed shoreline segment.

⁹ Ref SCCP Sect. 6 Conditions Necessary for Segments to be Deemed that Removal Actions are Complete

¹⁰ The term “segment” as defined in the SCCP is used to describe both segments and zones for Louisiana; Mississippi, Alabama, and Florida only have segments

¹¹ Ref Annex H GCIMT Battle Rhythm & Internal Communications

4. During any period where there are remaining Phase III operations in any state, USCG pollution investigators attached to the GCIMT will be the first responders to NRC reports of oiling on segments where removal actions have been deemed complete by the FOSC. If USCG personnel confirm the presence of MC252 oil, as necessary the FOSC will consult with the applicable state environmental agency or federal land manager,¹² and direct the appropriate response to be undertaken by BP,¹³ through a pre-designated Oil Spill Response Organization (OSRO). In directing such responses the FOSC will utilize clean-up endpoints from a range of criteria established in Chapter 5 of the SCCP according to specific shoreline type and location (e.g. no visible MC-252 oil for amenity beaches; less than 1% visible surface oil for non-amenity beaches; etc.). On all shoreline types, the FOSC will exercise sole discretion as to when any response is reasonable and practicable considering the available and approved removal methods and the net environmental benefit, based on conditions reported by responding USCG pollution investigators. Clean-up on segments cited by NRC reports, where removal actions have been deemed complete, will not be subject to the processes outlined in the SCCP. More specifically, no PISTs, SCAT monitoring, or SIRs will be required. In lieu of the SCCP review process, the Coast Guard will ensure that the cleanup is conducted in accordance with the FOSC direction and requirements. All applicable Best Management Practices (BMPs) and consultations as required under Section 7 of the Endangered Species Act (ESA) and Section 106 National Historic Preservation Act (NHPA) shall apply.
5. Maintain federal, state, tribal, local, and responsible party collaboration and partnerships in accordance with the NCP and supporting programmatic and consultation agreements.
6. Allocate adequate resources and support to enable communication and connectivity between the FOSC/FOSCR, BP, SOSCs and Federal Trustees to manage/oversee remaining operations as prescribed in the SCCP and the GCIMT Phase III Response Activities Completion Plan.
7. Continue to oversee Phase IV Documentation and Cost Recovery activities.¹⁴
8. Ensure documentation is preserved in accordance with the NCP.¹⁵

¹² Ref Appendix 4 – State and Federal Land Contacts

¹³ If the product cited in an NRC report is determined not to be MC252, or the source cannot be determined, traditional response in accordance with the NCP and applicable ACPs will apply. The appropriate USCG Sector or Marine Safety Unit will direct the response.

¹⁴ Ref NCP 40 C.F.R. 300.315

¹⁵ Ref 40 C.F.R. 300.315 & 33 C.F.R. part136

4. KEY MILESTONES

The following are key milestones to conclude Phase III response activities:

1. Completion of the Post-Hurricane Season (PHS) Inspections¹⁶ and FOSC determination that removal actions are complete for PHS segments in accordance with the SCCP.¹⁷
2. All segments, referenced in the SCCP, Chapter 4 are deemed removal actions complete.
3. Completion of Phase III oil recovery operations on the MC252 impacted shoreline segments in accordance with SCCP.
4. Removal shall be considered complete when so determined by the FOSC in consultation with the Governor or Governors of the affected states. When the FOSC considers removal complete, OSLTF removal funding shall end.¹⁸
5. Disband the Unified Command and GCIMT upon completion of Phase III.

5. GCIMT ORGANIZATION

Throughout the completion of Phase III the GCIMT will continue activities in support of the SCCP and will remain operational under the guidance of the Unified Command and authority of the FOSC. The GCIMT will progressively optimize staffing and resources to maintain efficiency of Phase III activities.

The following GCIMT Organization represents the basic structure employed to support the remaining Phase III activities.

¹⁶ Ref Post 2011 Atlantic hurricane season inspections in accordance with the SCCP

¹⁷ Ref SCCP Chapter 4

¹⁸ Ref 40 C.F.R 300.320(b)

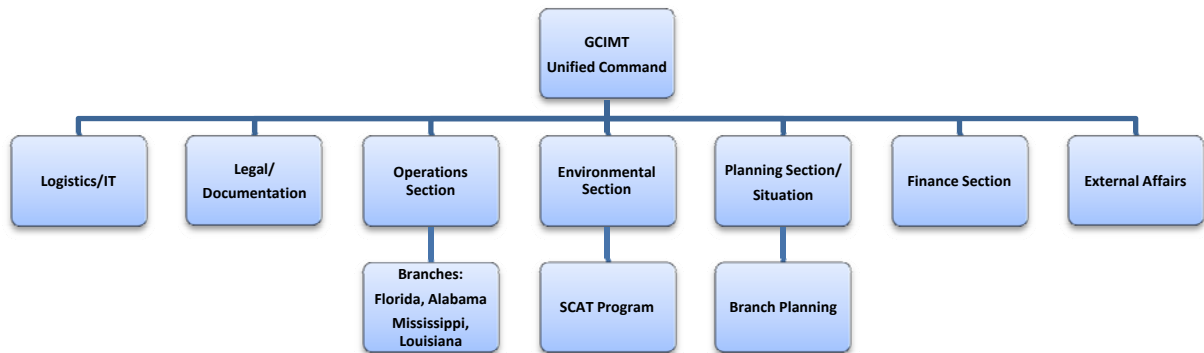


Figure 1- GCIMT Organizational Structure

6. KEY ACTIVITIES

The following key Unified Command activities support achievement of the purpose, objectives, critical priorities, and milestones of the Phase III activities.

1. Maintain situational awareness of continuing SCCP activities and ensure effective communications among the Unified Command; according to agreed meeting and reporting frequency approved by FOSC.¹⁹
2. Maintain ICS processes to include, but not limited to, the development of:
 - a. Branch Action Plans (BAPs)
 - b. Incident Action Plans (IAPs)
 - c. GCIMT Battle Rhythms
 - d. Meeting Schedules
 - e. Resource Summaries
 - f. Situation Reports
3. Record attendance of scheduled meetings held at a mutually agreed upon location, or via web conference if practical, to include Unified Command, Section Chiefs and members of the GCIMT staff as necessary for documentation purposes.
4. Ensure state, and federal stakeholders are informed of the disposition of response to NRC reports of MC252 oiling incidents.

¹⁹ Ref Annex H - Battle Rhythm & Communication Tools

5. Ensure documentation of all DWH response activities is maintained following approved protocols established during the response, and as required in accordance with the NCP.
6. Continue support of Biological Assessment activities and preservation of compliance documentation.²⁰
7. Continue support and adherence to the Endangered Species Act Section 7 and the National Historic Preservation Act (NHPA) Section 106, including preservation of compliance documentation.
8. Continue vessel and equipment decontamination as required.
9. Continue progressive demobilization of resources on a state by state basis or DOI managed land as segments are deemed removal actions complete and Phase III response activities conclude.
10. Continue stewardship of public funds.²¹
11. Decentralize the IMT functions to optimize operational efficiency of remaining Phase III activities in consultation with the SOSCs, Federal Trustees and BP.
12. Continue adherence to pertinent regulatory programs as required.
13. Timely response to internal and external requests for information (RFIs) and Freedom of Information Act (FOIA) processing.
14. Maintain use of the RestoreTheGulf.gov website for support of public interest regarding MC252 oil impacted shoreline segments.
15. Support concurrent Phase IV activities of the response. Phase IV of the response will continue following approved protocols established under 40 CFR §300.315.

²⁰ A Biological Assessment (BA) is a document prepared for Endangered Species Act Section 7 consultation which documents the Federal action agency's conclusions and rationale regarding the potential for a proposed activity to adversely affect listed and proposed species and designated and proposed critical habitat.

²¹ Public funds include, but not limited to, the Oil Spill Liability Trust Fund (OSLTF), and other agency funds as may be related to GCIMT activities.

7. ACRONYM LIST

<u>Acronym</u>	<u>Definition</u>
ACP	Area Contingency Plan
ADEM	Alabama Department of Environmental Management
AL	Alabama
AOR	Area of Responsibility
BA	Biological Assessment
BGEPA	Bald and Golden Eagle Protection Act
BMP	Best Management Practice
BP	BP
BSU	Base Support Unit
CMT	Contractor Management Team
COTP	Captain of the Port
DEP	Department of Environmental Protection
DEQ	Department of Environmental Quality
DHS	Department of Homeland Security
DOI	Department of the Interior
DWH	Deepwater Horizon
EA	External Affairs
ENV	Environmental
ERMA	Emergency Response Management Application
ESI	Electronically Stored Information
ESA	Endangered Species Act
FDEP	Florida Department of Environmental Protection
FL	Florida
FOIA	Freedom of Information Act
FOSC	Federal On-Scene Coordinator
FWS	Fish and Wildlife Service
GIS	Geographic Information System
GCIMT	Gulf Coast Incident Mgmt Team
GCRO	Gulf Coast Response Organization
GOM	Gulf of Mexico
GUIS	Gulf Islands National Seashore
IAP	Incident Action Plan
IC	Incident Commander
ICS	Incident Command System
IMT	Incident Management Team
IT	Information Technology
JAG	Judge Advocate General
LA	Louisiana
LNO	Liaison Officer
LOSCO	Louisiana Oil Spill Coordinator's Office
MBTA	Migratory Bird Treaty Act
MDEQ	Mississippi Department of Environmental Quality
MC-252	Mississippi Canyon Block 252
MIPR	Military Interdepartmental Purchase Request

<u>Acronym</u>	<u>Definition</u>
MISLE	Marine Information for Safety and Law Enforcement
MMPA	Marine Mammals Protection Act
MS	Mississippi
MSU	Marine Safety Unit
NERR	National Estuarine Research Reserve
NCP	National Contingency Plan
NHPA	National Historic Preservation Act
NOAA	National Oceanic and Atmospheric Administration
NOLA	New Orleans Louisiana
NOO-E	No Oil Observed Ever
NPS	National Park Service
NRC	National Response Center
NWR	National Wildlife Refuge
OPA90	Oil Pollution Act 90
OPS	Operations
OSLTF	Oil Spill Liability Trust Fund
OSRO	Oil Spill Response Organization
PES	Program Element Status
P&M	Patrolling and Maintenance
PIO	Public Information Officer
PIST	Pre-Inspection Survey Transmittal
PHS	Post-Hurricane Season Inspections
PRFA	Pollution Removal Funding Authorization
QRF	Quick Response Force
READ	Resource Advisor
RFI	Requests for Information
RP	Responsible Party
Section 7	U.S. Fish and Wildlife Service – Endangered Species Act
Section 106	National Historic Preservation Act
SERT	State Emergency Response Team
SIR	Shoreline Inspection Report
SCAT	Shoreline Cleanup and Assessment Techniques
SCCP	Shoreline Cleanup Completion Plan
SOSC	State On-Scene Coordinator
SSC	Scientific Support Coordinator
STR	Shoreline Treatment Recommendation
TAG	Technical Advisory Group
TNYOP	Transactions Not Yet On Post
TPAX	USCG Travel Preparation and Examination System
UAC	Unified Area Command
UC	Unified Command
USCG	United States Coast Guard
YN	Yeoman

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1. PURPOSE

Annex A describes the United States Coast Guard (USCG) organization and key activities in support of remaining DWH Phase III Gulf Coast Incident Management Team (GCIMT) operations. The Federal on Scene Coordinator (FOSC) responsibility for the Deepwater Horizon (DWH) Oil Spill Response will be maintained by the Eighth Coast Guard District (D8) to complete all removal activities as outlined in the Shoreline Clean-Up Completion Plan (SCCP). The USCG GCIMT staff will continue to serve as a subordinate unit of D8, to provide oversight of the DWH Response through the conclusion of Phase III. Endpoints for shoreline clean-up will remain condition based in accordance with the SCCP, and continue to guide the evolution of the GCIMT to the conclusion of Phase III. Upon completion of Phase III in each state, and associated federal lands, the FOSC will disband the GCIMT demobilizing remaining resources by state and associated federal lands as appropriate.

Once the FOSC has determined that Phase III removal efforts are complete, the FOSC will continue Phase IV Documentation and Cost Recovery,¹ as prescribed in the National Contingency Plan (NCP).² The USCG will continue to respond to future National Response Center (NRC) reports within the AOR, in accordance with the NCP.

2. USCG DWH RESOURCES

The USCG GCIMT members will continue to decentralize operational support and improve response efficiency in support of the remaining Phase III activities. The GCIMT organization will continue to be supported by local and remote participation utilizing web-based connectivity.

The following USCG GCIMT organizational support will be engaged for the remaining Phase III activities:

- a. The FOSC authority has been appointed by the Eighth Coast Guard District.
- b. FOSC Representative (FOSCR) – The FOSCR will be staffed by either a senior level Strike Team member (O4-O5) or a reserve O5 with prior spill experience and FOSCR qualifications.

1 Ref 40 CFR 300.315

2 Ref 40 CFR 300.310

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- c. Operations/Planning/Environmental – The USCG will maintain personnel assigned to the GCIMT Operations, Planning and Environmental Sections to ensure federal oversight of the SCCP and conclusion of Phase III activities. USCG staffing will include USCG Branch Directors, field responders, safety and SCAT team members.³
- d. Documentation – The Documentation Unit will remain staffed as necessary in support of Phase III & Phase IV (Documentation and Cost Recovery)⁴ to ensure documentation of the incident is completed in accordance with the National Contingency Plan (NCP). Preservation of the archived records associated with the response for the purposes of investigation, enforcement, and litigation will continue under the guidance of CG-094.⁵
- e. Biological Assessment – The Biological Assessment (BA) will be staffed as required for completion and will report to the Documentation Unit.
- f. Legal – The Coast Guard’s Judge Advocate General (JAG) will continue to provide legal support as needed through various levels of the organization, including Headquarters, Legal Services Command, and the Eighth USCG District office.⁶
- g. Finance and Logistics – The USCG will maintain USCG Reserve personnel to provide support to all USCG personnel mobilized for the response. The Finance and Logistics will continue to be staffed through the completion of Phase III. Detailed guidance is provided in Appendices 1 and 2 of this annex.
- h. External Affairs –
 - i. Public Affairs issues associated with DWH response efforts will continue to be managed by the Eighth USCG District Public Affairs Office with USCG Reserve personnel augmentation as required.
 - ii. Congressional inquiries will be coordinated by the FOOSC, with assistance provided by the Eighth USCG District External Affairs officer as needed.

³ Field responders include: Contract Management Team (CMT), Quick Response Team (QRT), Strike Team, Pollution Responders/Investigators, and other Marine Science Technicians (MSTs) as required. SCAT: Shoreline Cleanup Assessment Technique team.

⁴ Ref 40 C.F.R.300.160 NCP: During all phases of the response the lead agency shall complete and maintain documentation to support all actions taken under the NCP and to form the basis for cost recovery.

⁵ USCG: Office of the Judge Advocate General (CG-094)

⁶ Ref Appendix 3 – USCG Legal

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- iii. Liaison (LNO) support will be maintained with USCG Reserve personnel at the Eighth USCG District, Sector New Orleans, and Sector Mobile until such time as the FOSC sees fit to demobilize.

3. LOCATIONS

- a. USCG DWH responders will provide support from locations to include but not limited to:
 - i. GCIMT NOLA Office
 - ii. GCIMT D8 Office
 - iii. USCG BSU New Orleans
 - iv. USCG Sector New Orleans
 - v. USCG MSU Morgan City
 - vi. USCG Sector Mobile
 - vii. BP State Offices
 - viii. Mississippi State Office
 - ix. Mandeville Documentation Preservation Office

4. KEY ACTIVITIES

The following key activities must be performed in order to meet the purpose, and critical priorities of the Phase III operations.

- a. FOSC/FOSCR:
 - i. Ensure the RP maintains sufficient staffing to effectively complete all activities in accordance with the SCCP.
 - ii. Ensure effective communications are maintained between the FOSC/FOSCR, BP, SOSCs, and Federal Trustees as appropriate.
 - iii. Throughout Phase III progressively demobilize appropriate GCIMT response personnel, as impacted shoreline segments reach the SCCP endpoints criteria and removal actions are deemed complete by state and associated federal lands.
 - iv. Adjustment to the number of GCIMT USCG pollution investigators tasked with NRC report response to possible MC252 oil within the AOR, will occur based on analysis of NRC report data. Demobilization of these resources will occur no later than completion of Phase III activities in all affected states and associated federal lands.

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- b. Environmental/SCAT:
 - i. Continue to provide support and oversight of SCAT surveys to ensure inspections are conducted in accordance with approved GCIMT procedures, SCCP, BMPs and FOSC directives for Phase III activities.
 - ii. Ensure cultural, historical, wildlife and environmental concerns are addressed in accordance with approved GCIMT plans, STRs, BMPs and pertinent regulatory programs.
 - iii. Support the completion of the 2011 Post-Hurricane Season (PHS) Inspections as prescribed in the SCCP.
- c. Planning/Situation:
 - i. Continue to maintain situational awareness of Phase III activities.
 - ii. Ensure direct communications with the BP IC, SOSCs, and Federal Trustees are maintained, according to agreed meeting and reporting frequency approved by the FOSC.
 - iii. Coordinate the development and approval of Incident Action Plans (IAPs) with the FOSC/FOSCR, BP, SOSCs, and Federal Trustees as necessary.
 - iv. Ensure meetings, as requested by FOSC, BP, SOSCs or Federal Trustees are accommodated should the need arise. Meetings may be either attended in person at a mutually agreed location or joined remotely via phone or web conference and include the GCIMT General Staff as needed.
 - v. Ensure FOSC/FOSCR and Unified Command follow established Battle Rhythms to develop IAPs, track operational progress, and evaluate NRC report data.⁷
- d. External Affairs:
 - i. Public Information Office (PIO) will continue to provide DWH Response information and status updates to the RestoreTheGulf.gov website.
 - ii. PIO will continue to support frequently asked questions (FAQs), and press releases as appropriate.
 - iii. Liaison Office (LNO) will continue to support requests for information (RFIs), and maintain communications and coordination with federal, state and local stakeholders.
- e. Documentation and Cost Recovery:
 - i. Continue preservation of the archived records associated with the response for the purposes of investigation, enforcement, and litigation will continue under the guidance of the Coast Guard's Judge Advocate General & Chief Counsel (CG-094) and in accordance with legal preservation/hold orders

⁷ Ref Annex H Battle Rhythm and Internal Communications

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in place. Timely retrieval of archived DWH files and provision of historically accurate responses to requests for information (RFI) and Freedom of Information Act (FOIA) will continue under established protocols.

- ii. Ensure documentation of all DWH response activities are maintained following approved protocols established during the response.
- iii. Continue to provide support of Biological Assessment and National Historic Preservation Act (NHPA) documentation throughout Phase III and Phase IV.⁸

f. Operations:

- i. Continue to provide over-sight to ensure activities are conducted in accordance with approved GCIMT procedures, SCCP, BMPs and FOSC directives for remaining Phase III operations.
- ii. During any period where there are remaining Phase III operations in any state, USCG pollution investigators attached to the GCIMT will be the first responders to NRC reports of oiling on segments where removal actions have been deemed complete by the FOSC. If USCG personnel confirm the presence of MC252 oil, as necessary the FOSC will consult with the applicable state environmental agency or federal land manager,⁹ and direct the appropriate response to be undertaken by BP,¹⁰ through a pre-designated Oil Spill Response Organization (OSRO). In directing such responses the FOSC will utilize clean-up endpoints from a range of criteria established in Chapter 5 of the SCCP according to specific shoreline type and location (e.g. no visible MC-252 oil for amenity beaches; less than 1% visible surface oil for non-amenity beaches; etc.). On all shoreline types, the FOSC will exercise sole discretion as to when any response is reasonable and practicable considering the available and approved removal methods and the net environmental benefit, based on conditions reported by responding USCG pollution investigators. Clean-up on segments cited by NRC reports, where removal actions have been deemed complete, will not be subject to the processes outlined in the SCCP. More specifically, no PISTs, SCAT monitoring, or SIRs will be required. In lieu of the SCCP review process, the Coast Guard will ensure that the cleanup is conducted in accordance with the FOSC direction and requirements. All applicable Best Management Practices (BMPs) and

⁸ Phase IV occurs concurrently during the completion of Phase III

⁹ Ref Appendix 4 – State and Federal Land Contacts

¹⁰ If the product cited in an NRC report is determined not to be MC252, or the source cannot be determined, traditional response in accordance with the NCP and applicable ACPs will apply. The appropriate USCG Sector or Marine Safety Unit will direct the response.

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consultations as required under Section 7 of the Endangered Species Act (ESA) and Section 106 National Historic Preservation Act (NHPA) shall apply.

- iii. Remaining Phase III activities may utilize trained field response personnel for response to NRC reports in the AOR to provide on-scene MC252 identification in accordance with “Know Your Oil” initiatives and GCIMT field guides. If suspected product is not able to be determined on-scene a sample may be sent, to a USCG Lab,¹¹ for finger-printing to attempt to identify the responsible party. BP will be provided a split sample. USCG personnel will respond to the NRC in accordance with current law and regulations and directives of the USCG.

5. USCG GCIMT PHASE III NRC NOTIFICATION & RESPONSE PROCESS

- a. USCG Response Supervisors/Branch Directors
 - i. Notify USCG Field Personnel (CMT/QRT) to deploy for NRC reports of possible MC252 within the AOR.¹²
 - ii. Ensure the AOR NRC report analysis is provided to the UC as directed.
 - iii. Provide Sector or MSU all appropriate response feedback for input into the USCG incident data base (MISLE). Data entered in MISLE will record if the product was confirmed as MC252.
 - iv. Ensure NRC reports are responded to in accordance with Figure 1 and are reported to the GCIMT in accordance with Figure 2.
 - v. Ensure all DWH AOR NRC report actions are entered into MISLE.
- b. USCG Field Personnel:
 - i. Respond to NRC reports as directed by the FOSC/FOSCR or USCG Response Supervisors. Notify and consult with the applicable land manager and/or land owner prior to responding.¹³ Collect appropriate pollution incident data including but not limited to photographs, product samples, pollution descriptions, and/or source determination. Ensure information required for data tracking is provided to the USCG Response Supervisor/Branch Director and/or USCG GCIMT NRC Response Coordinator.

¹¹ USCG Labs include the USCG Research and Development Center as well as other facilities as may be contracted to support finger-printing of MC252 oil.

¹² CMT – Contract Management Team; QRT – Quick Response Team

¹³ Ref Appendix 4 – State and Federal Land Contacts

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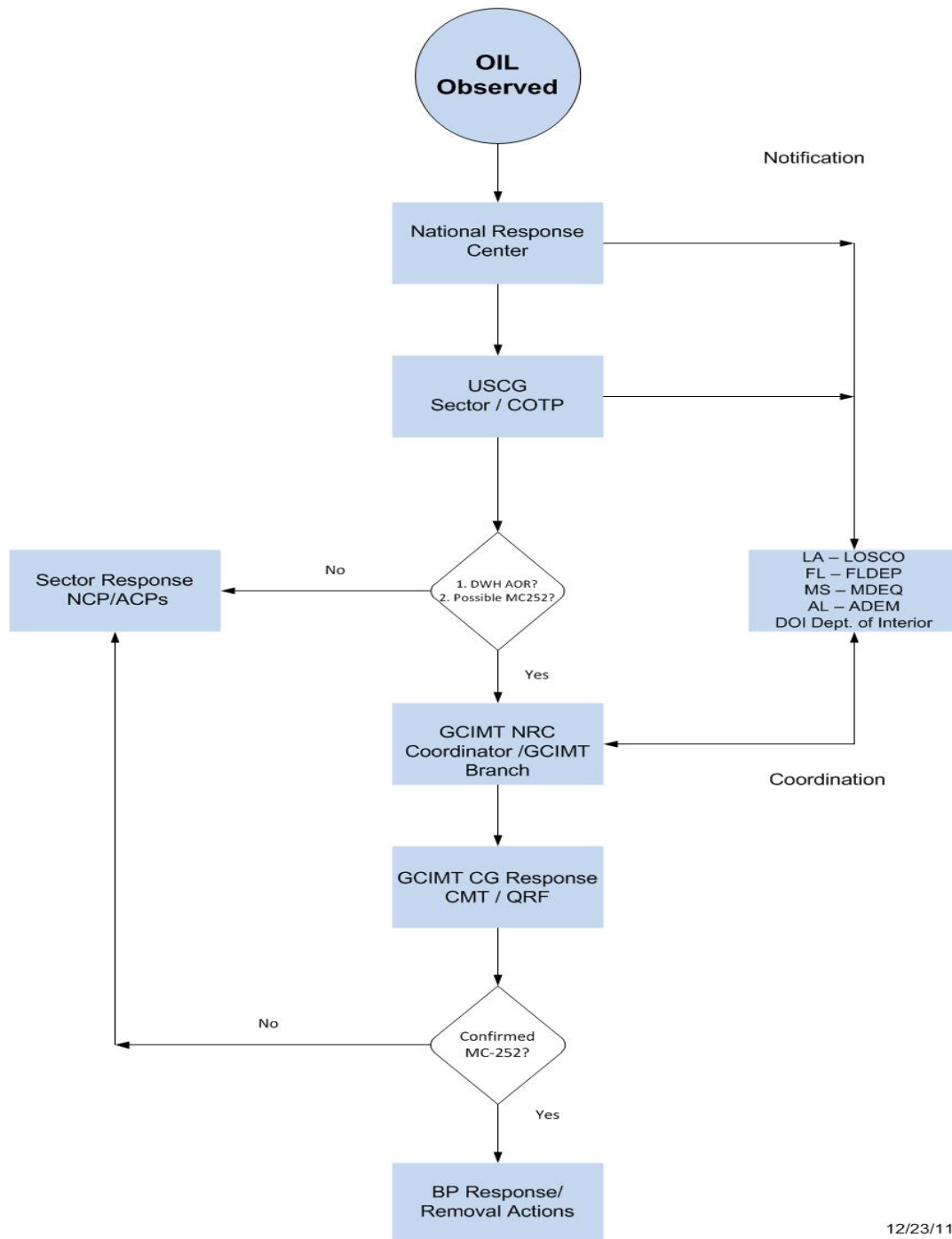
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- ii. Notify the USCG Response Supervisor/Branch Director if source is suspected to be MC252.
- iii. Oversee RP clean-up activity as directed by the FOSC/FOSCR and USCG Response Supervisor(s) in accordance with Figure 1.
- iv. Progressive demobilization of GCIMT Field Response personnel will be determined by state and associated federal lands to ensure that there is a suitable transition back to traditional oil spill response structures. Upon completion of Phase III all segments will follow traditional NRC reporting and response.

Figure 1 illustrates the GCIMT Phase III NRC Notification and Response process as may be exercised by USCG GCIMT personnel in support of oiling reports in the DWH MC252 AOR.

Figure 2 illustrates the GCIMT NRC Data Reporting Process and will ensure NRC data will be presented to the FOSC and Unified Command in accordance with the Battle Rhythm and Internal Communications guidelines (Annex H).

**GCIMT Phase III NRC Notification
& Response Process**



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Figure 1 – GCIMT Phase III NRC Notification & Response Process

GCIMT NRC Data Reporting Process

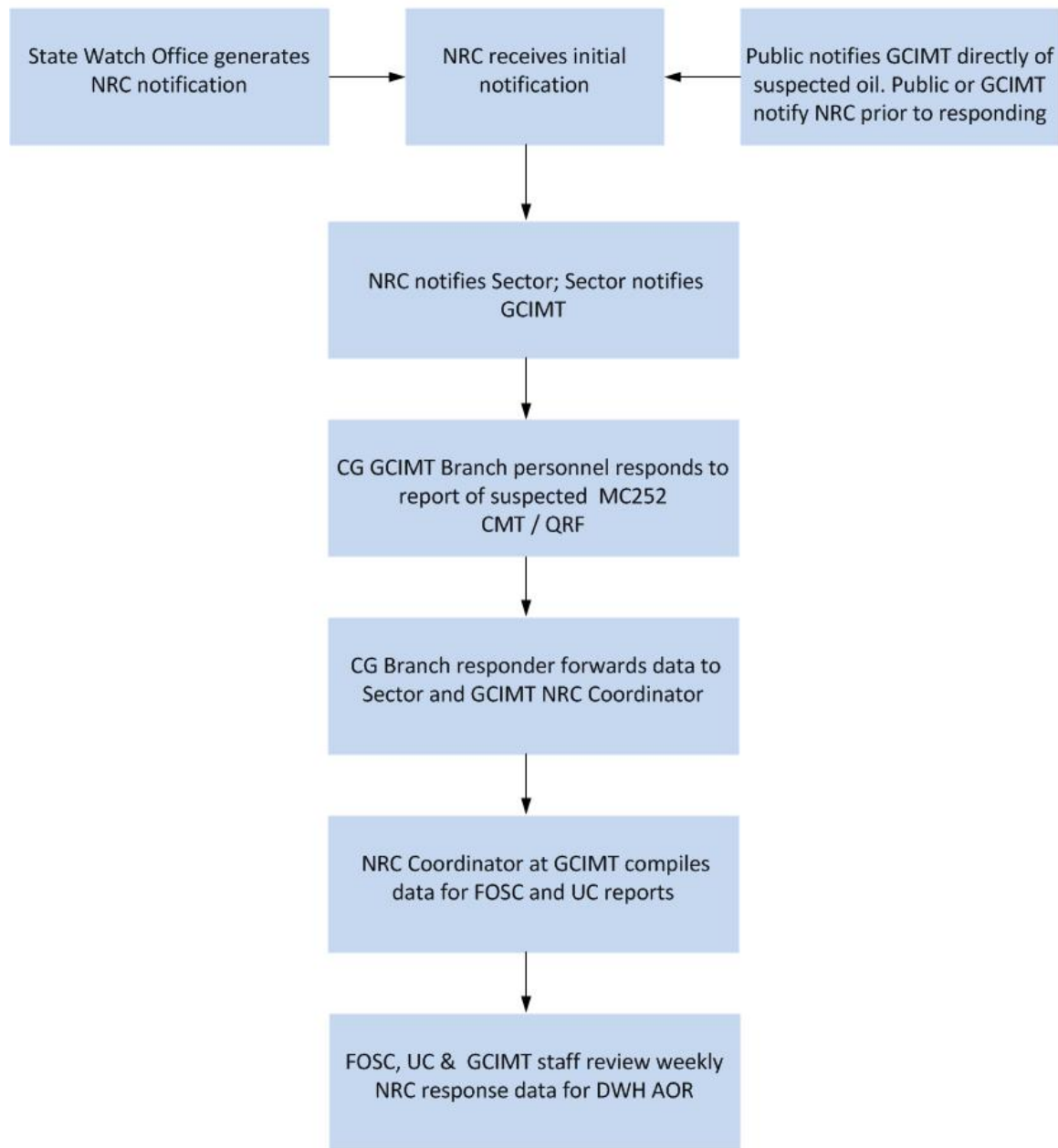


Figure 2 – GCIMT NRC Data Reporting Process

APPENDIX 1 - COAST GUARD FINANCE

1. SUMMARY: The Oil Spill Liability Trust Fund (OSLTF) will remain open to fund Pollution Removal Funding Authorizations (PRFA), travel orders and Military Interdepartmental Purchase Requests (MIPR) related to the requirements of the Shoreline Clean-up Completion Plan (SCCP), or ongoing Phase III response efforts. The following describes the Finance Section duties:

- a. Compile and complete daily Cost Reports
- b. Review and certify invoices and cost documentation
- c. Inventory, monitor, and assist demobilization of reportable property
- d. Approve Funding for PRFA, MIPRs, travel & other financial documentation
- e. Provide reconciliation services
- f. Research and resolve Transactions Not Yet On Post (TNYOP)
- g. Research and resolve Program Element Status (PES) errors

2. DISCUSSION:

- a. PRFAs & MIPRs: All Phase III activities, approved by the FOSC, consistent with OPA 90, its implementing regulations, and the NCP, will continue to be funded under existing PRFAs & MIPRs.
- b. Oil Spill Liability Trust Fund (OSLTF): The OSLTF will remain open under the authority of the FOSC for the duration of Phase III & Phase IV. Any response to confirmed MC-252 episodic re-oiling will be funded through the response fund. Once the Coast Guard returns to traditional operations under the National Contingency Plan (NCP), funding will be provided as required to complete all Documentation and Cost Recovery Efforts (Phase IV).
- c. Organization: Under the GCIMT Phase III Response Activities Completion Plan, the following organizational support will be utilized to meet continuing financial objectives and requirements:
 - a. Property Unit: The property section is responsible for maintenance of property records and ensuring the proper demobilization of reportable property.
 - b. Cost Unit: This section is responsible for compiling cost reports as well as reviewing and validating invoices.
 - c. Account Validation Unit: This section is responsible for maintaining the reconciliation of the account as well as researching any errors or irregularities.

ANNEX A: USCG DWH ORGANIZATION

GCIMT Phase III Response Activities Completion Plan

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- d. Staffing Level: Under the GCIMT Phase III Response Activities Completion Plan, the Finance Section requires (3) positions to include: (1) Chief Warrant Officer (CWO)/Chief Store Keeper (SKC) or above and (2) Storekeepers (SKs). Once the majority of the reportable property at the outlying locations is properly disposed of, it is projected the position count can be decreased to (2) members consisting of (1) SKC and (1) SK.
- e. Measures: Based on the tasking for the Finance Section, the following are recommended measures of workload and effectiveness:
 - a. Measures for Reconciliation:
 - i. Number of line items per PES report
 - ii. Number of weeks of un-reconciled PES reports
 - iii. Number of PES¹⁴ errors over 30 days old
 - iv. Number of TNYOP¹⁵ over 30 days old
 - b. Measures for Property:
 - i. Number of line items
 - ii. Number of custodians
 - iii. Total dollar value of property
 - iv. Accountability discrepancies
 - c. Measures for Cost Team:
 - i. Number of invoices pending
 - ii. Number of response personnel to account for on 5136 (time accounting sheets)
 - iii. Number of outstanding PRFAs/MIPRs
 - iv. Dollar value of outstanding PRFAs/MIPRs

¹⁴ PES: Program Element Status

¹⁵ TNYOP: Transactions Not Yet On Post

APPENDIX 2 - COAST GUARD LOGISTICS & IT SUPPORT**1. SUMMARY:**

There is a requirement for continued logistical support for the duration of Phase III activities. The Logistics and IT Section will provide on-going support for USCG GCIMT. The need to manage administrative support, resource requests and demobilization requirements will continue throughout Phase III. The following describes the duties of the Logistics/IT Section:

- a. Assist filing/processing travel claims
- b. Mobilize and demobilize USCG members
- c. Draft and approve amendments to orders
- d. Process resource requests (213's) for all required personnel and equipment
- e. Maintain and dispatch government vehicles
- f. Manage and maintain IT equipment
- g. Maintain communications over-sight
- h. Provide Electronically Stored Information (ESI) preservation support.

2. LOGISTICS:

- a. Personnel Support: Ensure accuracy of members' orders and ensure timely completion of all orders and amendments. Assist members with preparation and submittal of travel claims. Ensure all 213's are completed and tracked for all personnel/resources needed to support on-going response activities. Mobilize and demobilize members as needed.
- b. Supply: Ensure that all equipment and supplies are ordered and delivered to personnel as required.
- c. Transportation: Track and monitor all government vehicles assigned to the response to ensure the vehicles are used and maintained properly.
- d. Communications: Maintain communications equipment, logs, process oversight and contact lists as appropriate.
- e. Staffing: Logistics will be managed by a CWO/O2 with critical resource experience. Personnel support will require 2-5 Yeomen (YN) including a minimum of 3 YNs with TPAX authorization for the duration of the response. Supply and transportation will be managed by one SK (E6 or above).

3. IT SUPPORT:

- a. GCIMT Support: The IT staff will continue to provide IT support for the USCG GCIMT personnel.
- b. Phase III Support: Prior to downsizing the existing IT staff, all space required for relocation to District Eight and BSU New Orleans will be prepared for use. Accounts and data files will be established on a dedicated DWH server at BSU. The existing Incident Command Post at 1250 Poydras may be consolidated and/or de-centralized. Devices, routers, switches, servers, and wiring will be removed and inventoried prior to transfer to Mandeville and/or DRMO in coordination with TISCOM and/or ESU New Orleans. Upon completion of relocation/de-centralization activities the IT Coordinator and approximately one-half of the current IT staff will be demobilized.
- c. Staffing: Two IT technicians have been transferred to Mandeville to manage Electronically Stored Information (ESI) capture under the direction of the Documentation Unit and CG-094. Four IT technicians will remain attached to the core GCIMT to support the CGIMT. During Phase III it is expected the IT staff may be further reduced to 2 support personnel.

APPENDIX 3 – USCG LEGAL AUTHORITIES

1. SUMMARY:

Authorities for oil spill response are provided by the authorities discussed herein.

2. DISCUSSION:

- a. Response: The primary authorities defining federal, state, and responsible party actions during an oil spill are the Clean Water Act, 33 U.S.C. § 1251, et seq. (1972) (“CWA”); the Oil Pollution Act of 1990, 33 U.S.C. § 2701, et seq. (1990) (“OPA 90”); and the National Oil and Hazardous Substances Pollution Contingency Plan, 40 C.F.R. § 300.1 et seq. (“NCP”). The most specific of these in terms of guiding response actions and responsibilities is the NCP, which provides an organizational structure and procedures for preparing for and responding to discharges of oil and establishes the role of the (Federal) On-Scene Coordinator (“FOSC”). 40 C.F.R. § 300.120(a). The FOSC is responsible for directing response efforts at the scene of a discharge, as well as other activities including the collection of samples, reports, and documents to support cost recovery actions. 40 C.F.R. § 300.1 et seq.

The “Operational Response Phases for Oil Removal” (“Removal”) are outlined by the NCP at 40 C.F.R. § 300.300-15:

Phase I Discovery or notification

Phase II Preliminary assessment and initiation of action

Phase III Containment, countermeasures, cleanup, and disposal

Phase IV Documentation and cost recovery

Removal shall be considered complete when so determined by the FOSC in consultation with the Governor or Governors of the affected states. When the FOSC considers removal complete, Oil Spill Liability Trust Fund removal funding shall end. This determination shall not preclude additional removal actions under applicable state law. 40 C.F.R. § 300.320(b).

ANNEX A: USCG DWH ORGANIZATION

GCIMT Phase III Response Activities Completion Plan

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APPENDIX 4 – STATE AND FEDERAL LAND CONTACTS

Upon completion of Phase III in each state, and associated federal lands, the FOSC will progressively disband the GCIMT demobilizing resources as appropriate. In the event that USCG personnel confirm the presence of MC252 oil in an area removed from the response, as necessary the FOSC will consult with the applicable state environmental agency or federal land manager and direct the appropriate response. The following points of contact will be used under these circumstances.

DOI:

- 1) Breton Islands and Chandeleurs, Louisiana
Southeast Louisiana Project Leader: 985-285-3335
- 2) Bon Secour National Wildlife Refuge
Refuge Manager: 251-540-7720
- 3) Gulf Islands National Seashore
Superintendent: 850-934-2613 or Project Manager: 251-442-6068
- 4) BLM Segments in Alabama
Field Office Manager through Field Office Biologist: 601-977-5431

FLORIDA:

- 1) FDEP Northwest District Assistant Director: 850-595-8300*

ALABAMA:

- 1) ADEM Coastal Beach and Dune Manager: 334-239-1694*

MISSISSIPPI:

- 1) Mississippi Department of Environmental Quality (MDEQ): 601-961-5171
- 2) Compliance and Enforcement: 601-961-5308*
- 3) Assessment and Remediation: 601-961-5217*

LOUISIANA:

- 1) Louisiana Oil Spill Coordinator's Office
Department of Public Safety & Corrections: 225-925-6606

* Former SOSCs

ANNEX B: BP DWH ORGANIZATION

GCIMT Phase III Response Activities Completion Plan

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ANNEX B: BP DWH ORGANIZATION**GCIMT Phase III Response Activities Completion Plan****1. PURPOSE**

BP remains committed to fulfilling its responsibilities as a Responsible Party. This annex describes BP's support of a collaborative decentralization of the current GCIMT organization as Phase III of DWH Response efforts are completed. BP fully supports the activities required prior to the Federal On Scene Coordinator (FOSC), in consultation with the Governor or Governors of the affected states, determination that removal efforts are complete under 40 C.F.R. 300.320(b) for the Deepwater Horizon (DWH) Oil Spill Response.

2. STATUS

The Shoreline Cleanup Completion Plan (SCCP), which was approved by the FOSC on 2 November 2011, defines the process to deem that removal actions are complete on each shoreline segment within the DWH Response. The SCCP provides the mechanisms for ceasing active clean-up operations where Unified Command agrees that segments have been cleaned to the point where removal actions have been completed. In addition, the SCCP provides the processes to deem that removal actions are complete for all segments that were never impacted by MC252 oil, where endpoints have been met, or where the FOSC determines current conditions are no longer a threat to the environment, or where further removal actions may cause more harm than good. Current status of the shoreline clean-up efforts as of December 2011:

- a. More than 90% of the surveyed shoreline¹ is currently being managed through the process defined in the SCCP in order to deem that removal actions have been completed.
- b. Approximately 10% of the surveyed shoreline is under active Patrol & Maintenance² (P&M) activities. P&M activities continue across approximately 400 miles³ in the four states. As P&M activities in these segments are completed, each segment will follow the survey/inspection/monitoring/approval process defined in the SCCP to determine that removal actions are complete.
- c. The Post-Hurricane Season (PHS) Inspections are underway to re-inspect more than 300 miles of shoreline across the Area of Responsibility (AOR) as part of the process for deeming removal actions complete for the majority of the shoreline that has already met agreed upon endpoints in accordance with the SCCP.

¹ Surveyed shoreline represents more than 4300 shoreline miles surveyed for Phase III clean-up activities

² Ref SCCP Section 3: Patrol and Maintenance (P&M) Frequencies of Stage 4 STRs

³ 400 miles represents less than 10% of the shoreline miles surveyed for Phase III clean-up activities

ANNEX B: BP DWH ORGANIZATION**GCIMT Phase III Response Activities Completion Plan****3. BP DWH RESOURCES**

BP remains committed to fulfilling its responsibilities as a Responsible Party. Throughout the DWH Response, resources and IMT structure have been optimized to support operations. BP will continue to flex resources as needed to complete Phase III activities. This commitment includes maintaining sufficient staffing to ensure effective completion of all DWH Response efforts in accordance with the SCCP. Specific actions taken include:

1. Contracts with Oil Spill Response Organizations (OSROs) have been structured to effectively provide scalability and flexibility to address scheduling for variables, such as episodic re-oiling and favorable tide and weather conditions.
2. The number of SCAT field teams has been increased to facilitate efficient completion of all PHS Inspections.
3. The number of PIST/SCAT Monitoring Team Leads has been increased in each state.
4. In order to manage the scheduling, notification, documentation and other administrative requirements in the SCCP, additional back-office resources have been added.
5. Additional Natural Resource Advisors (NRAs) have been added to accommodate the increased SCAT and Operations activities.
6. To ensure compliance with Section 106, additional Archaeologists have been contracted.
7. The Waste Team continues to maintain resources to ensure conformance with the Gulf-Wide Waste Management Plan.
8. A sampling team is being maintained for any requirements as necessary.
9. The Planning Section is utilizing resources from BP IT&S to help document and improve the processes for data collection, data management, and reporting.

4. BP DWH ORGANIZATION

BP established a purpose-built organization to facilitate delivery of its commitments – completing the response, supporting environmental and economic recovery. This organizational structure is similar to the one used for Business Units and Performance Units across BP's global enterprise and is based on the principles of hierarchical command and control, grouping of teams according to function, and processes to ensure linkage between teams. The BP organization has mapped directly into the ICS Structure utilized by the GCIMT and the key players within this organization have been involved in the Deepwater Horizon Response in the same or similar capacities.

ANNEX B: BP DWH ORGANIZATION**GCIMT Phase III Response Activities Completion Plan**

Beginning in 1Q CY2012 BP will transition key players into the lead IMT roles, replacing the temporary contractors. Advanced notification and managed transitions will ensure a successful turn-over of responsibilities and maintain continuity of GCIMT operations. BP's leaders in the response will deliver BP's DWH oil spill response responsibilities drawing support from functional expertise located in BP's Houston and Gulf State offices (FL, AL, MS, LA). Through a decentralized GCIMT, the BP DWH organization will integrate existing remote support as indicated in the organizational chart below (Figure 1).

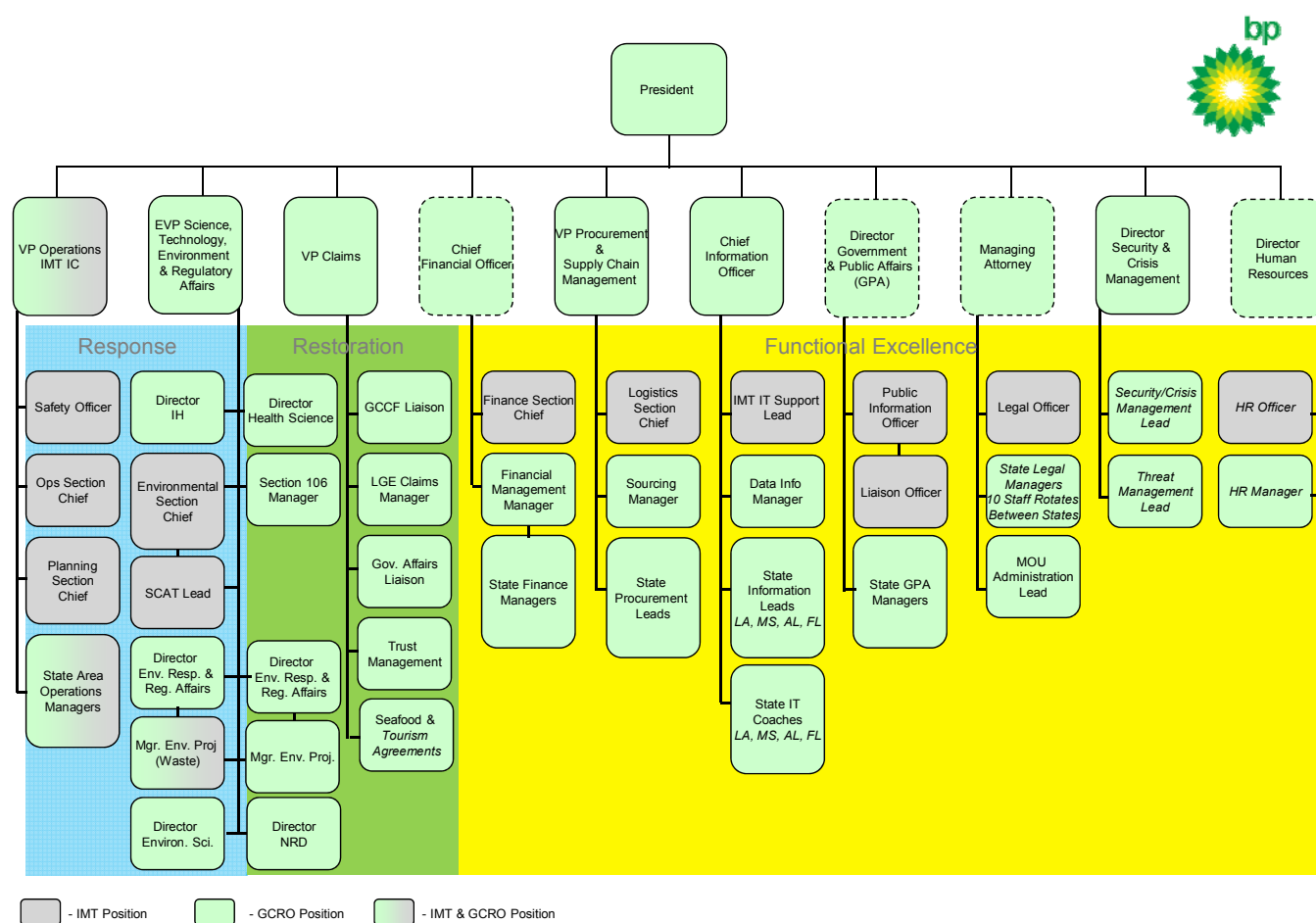


Figure 1: BP DWH Response Organization (illustrated in purple fields)

ANNEX B: BP DWH ORGANIZATION**GCIMT Phase III Response Activities Completion Plan****5. LOCATIONS**

A number of the BP functions have been decentralized for some time:

- a. The BP Logistics Section Chief has been operating from the BP Louisiana state office through a procurement team based in Houston.
- b. GIS support for the response is being provided by the team in Houston.
- c. The BP Finance Section Chief has been operating from the BP Louisiana state office.
- d. BP State Offices are currently at the following addresses:
 - BP Alabama Office
3947 Gulf Shores Parkway,
Suite 280
Gulf Shores, AL 36542
251-201-1900
 - BP Florida Office
2179 Highway 98 East
Mary Esther, FL 32569
850-226-5007
 - BP Louisiana Office
1250 Poydras St
New Orleans, LA 70113
504-335-0900
 - BP Mississippi Office
2505 14th Street
Gulfport, MS 39501
228-236-1410

As the GCIMT Phase III Response Activities Completion Plan is implemented, BP's workforce will continue to migrate from GCIMT New Orleans (NOLA) to BP offices and other decentralized locations as appropriate. Presently BP has secured office space on the 17th floor of 1250 Poydras Street in NOLA through 31 March 2012 for the following GCIMT personnel:

- a. FOSC & FOSCR
- b. BP IC
- c. SOSCs
- d. DOI Trustee
- e. USCG Deputy Planning Section Chief
- f. USCG Operations Section Chiefs
- g. GCIMT Environmental Section personnel & USCG ENV/SCAT Supervisor

Beyond March 31, 2012 office space will be made available to members of the UC (including SOSCs for states with remaining Phase III activities) for the duration of Phase III. Members of the UC may decentralize to support their activities at their discretion.

The initial Battle Rhythm focuses the Unified Command meetings on Wednesdays. BP offices will host the meetings face-to-face as needed. Additionally, the offices in Louisiana and in Alabama have Cisco Telepresence technology, which may be utilized to enhance remote meeting capability. Web conferencing is also available via Live Meeting to enhance decentralized meetings.

ANNEX B: BP DWH ORGANIZATION**GCIMT Phase III Response Activities Completion Plan****6. FAMILIAR TOOLS AND PROCESSES**

The IAP will continue to be the platform to support GCIMT throughout Phase III.

ICS forms will continue to provide visibility to:

- i. Incident Objectives (ICS- 202)
- ii. Assignments (ICS 204)
- iii. Organization (ICS 207)
- iv. Operational Planning (ICS 215)
- v. Work Analysis (ICS 234)
- vi. Open Actions (ICS 233), etc.

The Battle Rhythm includes:

- i. The Objectives - Tactics - Planning meeting cycle, initially with a monthly frequency.
- i. Regularly scheduled meetings of the Command & General Staff to facilitate Unified Command collaboration, maintain situational awareness, and aid the review of on-going SCCP operations.
- ii. Regularly scheduled reviews of the tracker results.

Several tools have been developed to provide segment-by-segment visibility into the shoreline cleanup progress in support of the SCCP:

- i. The Operations Segment Tracker portrays material collected and visitation frequency.
- ii. The P&M Frequency Change Tracker portrays the progression of segments through the frequency change process.
- iii. The SCAT Segment Tracker demonstrates progression (dates and results) as segments move through PISTs, SIR inspections, SCAT monitoring, and removal actions are deemed complete; in accordance with the SCCP.
- iv. The SIR Approval Tracker illustrates the progression of SIR sign-offs.

BP & GCIMT will continue to produce and utilize these tools to report recovery efforts and results. The tracking tools are produced from SCAT and Operations databases containing detailed information about each segment. The tools themselves will continue to evolve and be utilized in service of Unified Command objectives.

ANNEX C: DEPARTMENT OF INTERIOR DWH ORGANIZATION

GCIMT Phase III Response Activities Completion Plan

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ANNEX C: DEPARTMENT OF INTERIOR DWH ORGANIZATION**GCIMT Phase III Response Activities Completion Plan****1. PURPOSE**

The purpose of this annex is to identify DOI staffing levels and functions in order to:

- a. Ensure adequate levels of oversight for the protection and management of natural and cultural resources within the federally protected Refuges and National Seashore during Phase III
- b. Support completion of the remaining Phase III cleanup and disposal activities
- c. Provide support to the FOSC to accomplish compliance activities under Section 7 & 106
- d. Continue DOI documentation preservation and Phase IV Cost Recovery and Documentation activities

DOI will maintain a purpose-built organization to facilitate response activities described in the Shoreline Cleanup Completion Plan (SCCP). These activities include active cleanup, patrol and maintenance, SCAT surveys, SCAT inspections, monitoring and protection of wildlife and wildlife habitat, and cultural property protection and documentation.

2. GCIMT DOI TRUSTEE

A DOI Trustee position will be maintained to ensure continuity of operations. Office space will initially be needed for this position at the GCIMT. As Phase III activities progressively diminish, and decentralized support tools are effectively implemented, the Trustee position may transition to a remote location, as determined by the DOI and the FOSC. At an appropriate time, the DOI Trustee responsibilities may be delegated to senior staff at Fish and Wildlife Service (FWS) and National Park Service (NPS) Regional Offices in Atlanta and the position will be demobilized.

3. GCIMT DOI ADMINISTRATIVE SUPPORT

During remaining Phase III activities support for resource ordering, demobilizations, disbursement of property, and other administrative tasks will be required. During remaining Phase III activities this position will also transition from full time in GCIMT to a remote location with reduced hours.

Safety of DOI staff will follow safety plans and procedures of the response, augmented by remote FWS safety personnel in Atlanta.

ANNEX C: DEPARTMENT OF INTERIOR DWH ORGANIZATION**GCIMT Phase III Response Activities Completion Plan****4. RESOURCES & FIELD ACTIVITIES**

DOI lands affected by this spill include five National Wildlife Refuges in four states (LA, MS, AL, & FL) and Gulf Islands National Seashore in Florida and Mississippi. Due to the congressionally mandated level of protection for these Federal areas, along with a significant level of public use on these lands, a proactive program, as prescribed in the SCCP, to detect and address re-oiling events is required through completion of Phase III. Throughout the remaining Phase III activities Resource Advisors (READs) will continue to support GCIMT objectives performing periodic patrol for possible oiling of these protected areas during GCIMT operations,

LOUISIANA: Southeast Louisiana Refuge Complex which includes Breton Island, Chandeleur Islands, and Delta NWRs has conducted their own patrol, monitoring, and coordination, in addition to GCIMT operations, utilizing their own staff. Southeast Louisiana Refuge Complex will continue this effort until Phase III is complete.

EASTERN STATES: Phase III activities on Federal lands within the three eastern states (MS, AL, FL) will be accomplished through the existing DOI DWH Project Management Office, established for response activities in March of 2011, at Gulf Islands National Seashore (GUIS), Gulf Breeze, Florida.

A Project Manager, working with the DOI Trustee, will ensure collaboration with FWS, BLM, NPS, GCIMT, USCG, BP offices and the States. This position will coordinate planning and logistical support for DOI READs in the eastern states.

a. **GRAND BAY NATIONAL WILDLIFE REFUGE**

Throughout completion of Phase III activities, patrolling of the shoreline and marsh areas at Grand Bay National Wildlife Refuge (NWR) for re-oiling will be completed periodically by NWR staff and Grand Bay National Estuarine Research Reserve (NERR) personnel while conducting routine patrols and research activities.

b. **BON SECOUR NATIONAL WILDLIFE REFUGE**

The Bon Secour Manager retains overall responsibilities for actions within the Refuge, including frequency changes and signature authority on SIRs. SCCP activities will be coordinated through the DOI Project Manager.

ANNEX C: DEPARTMENT OF INTERIOR DWH ORGANIZATION
GCIMT Phase III Response Activities Completion Plan

READs currently assigned to Bon Secour will be reassigned to the Mississippi Branch, GUIS (Gulf Islands National Seashore). The READ office at Gulf Shores has been demobilized as of December 23, 2011. Administrative functions for Bon Secour field activities will be transferred to the DOI Project Office.

c. **BUREAU OF LAND MANAGEMENT SEGMENTS**

The Field Office Manager, through the Field Office Biologist, retains overall responsibilities for actions concerning the three segments of BLM land west of the Perdue Unit of Bon Secour NWR, including frequency changes and signature authority on SIRs.

d. **GULF ISLANDS NATIONAL SEASHORE**

The superintendent retains overall responsibilities for actions within the park, including frequency changes and signature authority on SIRs. Until such time as response is deemed complete, the existing infrastructure of the project office will remain intact.

The two significant changes are:

- 1) Operational recovery actions within Bon Secour NWR and the BLM segments will also be facilitated through the DOI Project Office.
- 2) Projected Mississippi READ staffing levels have been increased from 10 to 26, to meet Operational and SCAT task projections. Staffing levels will be adjusted as required to support remaining Phase III activities.

e. **REGULATORY COMPLIANCE SUPPORT**

i. Natural Resources

As identified in the SCCP, response activities shall be completed in compliance with trust natural resource laws, including the Endangered Species Act (ESA), Migratory Bird Treaty Act (MBTA), and Marine Mammals Protection Act (MMPA) & Bald and Golden Eagle Protection Act (BGEPA). The FWS will continue to provide Section 7 and technical assistance support for ongoing Phase III activities, as well as Endangered Species Act (ESA) support to the Coast Guard for their preparation of a Biological Assessment regarding the Coast Guard's Deepwater Horizon Emergency Oil Spill Response. These activities will be performed remotely from Atlanta and Washington Offices, with occasional field visits if needed.

ANNEX C: DEPARTMENT OF INTERIOR DWH ORGANIZATION**GCIMT Phase III Response Activities Completion Plan**ii. National Historic Preservation Act (NHPA) Support

Continued compliance with NHPA will be required in all Response activities. DOI will continue to provide support in order to complete NHPA Section 106 compliance documentation for the USCG and on behalf of the Trustees: the DOI Historic Property Specialist will continue advising the USCG and Trustees. The current Section 106 Review structure and framework has proven effective, and it will be maintained at GCIMT for the present time. Office space is required for this function.

iii. Cost Documentation

During Phase III activities, DOI will continue to staff at appropriate levels in order to comply with financial standards covered by Phase IV, Incident Documentation and Cost Recovery standards.

ANNEX D: FLORIDA DWH ORGANIZATION**GCIMT Phase III Response Activities Completion Plan**

The State of Florida will continue to provide state oversight regarding Deepwater Horizon (DWH) response activities within Florida pursuant to the National Contingency Plan (NCP). Accordingly, the State will provide a State On- Scene Coordinator (SOSC), a Scientific Support Coordinator (SSC), a State Branch Liaison, and Shoreline Cleanup Assessment Technique (SCAT) team representatives. These positions are anticipated to remain throughout FL Phase III as described below.

1. FL SOSC

As the voice of Florida's citizens and local and state government officials, the Florida SOSC will remain deployed in New Orleans (NOLA) on the Gulf Coast Incident Management Team (GCIMT) until the Florida SOSC, in consultation with his/her constituents and Florida Department of Environmental Protection (FDEP) management & the FOSC, determines that the job duties can be performed remotely. It is anticipated that as more segments are removed from active response in accordance with the Shoreline Clean-up Completion Plan (SCCP), that the opportunity for remote management of the response will increase.

2. SSC

The Florida SSC will continue to support the SOSC providing both technical advice as well as serving as the backup SOSC as needed. The SOSC will continue to schedule the SSC's time in New Orleans to coincide with critical meetings and to serve as the SOSC as necessary. Remote assistance will be provided by the SSC when he/she is not physically present in NOLA.

3. STATE BRANCH LIAISON

The Florida Branch State Liaison will continue to provide full time support to the DWH Response coordinating branch activities, supervising and coordinating DEP SCAT team members and assisting the SOSC with local government and citizen liaison activities. It is anticipated that this position's duties will not change for the duration of FL Phase III activities.

4. SCAT TEAM REPRESENTATIVES

Florida will continue to provide SCAT team representatives to support DWH response activities. It is anticipated that as the number of active Florida shoreline segments continues to decline and the Post Hurricane Season (PHS) Inspections are completed, that the number of SCAT team representatives will be reduced. One team representative will continue to support the State Branch Liaison as his/her alternate and provide assistance with segment status tracking throughout remaining FL Phase III activities.

ANNEX E: ALABAMA DWH ORGANIZATION
GCIMT Phase III Response Activities Completion Plan

Until such time the FOSC determines Phase III complete for the state of Alabama, Alabama will support response effort by continuing to provide state oversight. Alabama will continue to provide a dedicated SOSC and other support positions, as needed.⁴ Alabama staff will provide remote participation and support throughout remaining AL Phase III activities; to include execution of the SCCP and response efforts for the recovery and disposal of tar balls and tar mats.

1. AL SOSC

Alabama will provide an SOSC working from the BP Alabama Office as long as that arrangement remains practicable and amenable. The Alabama SOSC will be collocated with USCG GCIMT field personnel until the completion of Phase III in Alabama. BP will continue to facilitate GCIMT meetings at the BP Alabama Office. Communications between the Alabama SOSC and the GCIMT/UC/D8 and/or Sector Mobile will occur frequently through teleconferences and emails and occasionally via TelePresence, web conferencing, and face-to-face. Alabama will continue to provide support to the SOSC/GCIMT as needed.

2. SCAT

Alabama will continue to provide field staff to support SCAT activities as needed.

3. STATE SCIENTIFIC SUPPORT

Alabama will continue to provide scientific support (technical advice) to the SOSC as needed. These tasks will continue to be accomplished from a remote location typically utilizing telephonic and email communications.

Alabama will facilitate response objectives by providing staff to support additional requirements as needed to include but not limited to:

- a. Public information and external affairs liaison support
- b. Information technology (IT) support
- c. Administrative support

These tasks will continue to be accomplished remotely typically utilizing telephonic and email communications.

⁴ The Governor of Alabama reserves the right to override any commitment herein at any time for any reason.

ANNEX F: MISSISSIPPI DWH ORGANIZATION
GCIMT Phase III Response Activities Completion Plan

The State of Mississippi will continue to maintain State oversight and support, in accordance with the National Contingency Plan (NCP), through the State of Mississippi On-Scene Coordinators (MS SOSCs), for DWH response activities within the State of Mississippi. The State will continue to staff personnel with the MS Department of Environmental Quality (MDEQ) in support of MS Phase III activities and includes the following:

- a) One (1) Environmental Leader (Env Lead)
- b) Three (3) State Emergency Response Team (SERT) members, one (1) per each of the coastal counties of Hancock Co., Harrison Co., and Jackson Co.
- c) State's SCAT team representatives

The State will continue to evaluate staffing needs in coordination with the FOSC/FOSCR on a monthly basis as the number of segments in the response continues to decrease. The following resources and activities will continue in support of remaining MS Phase III activities:

1. MS SOSC

The MS SOSCs will continue, on a rotational basis, to remain deployed in New Orleans, LA (NOLA), at the Gulf Coast Incident Management Team (GCIMT), until such time that the State, in consultation with the FOSC, determines that the job duties can be adequately conducted remotely. It is anticipated that as SCCP activities continue to progress, as shoreline segments continue to be deemed "removal actions are complete," that the opportunity for remote management by the MS SOSCs will become more viable.

2. MS ENVIRONMENTAL LEADER (ENV LEAD)

The MS Env Lead will continue to operate remotely, from MDEQ's South Regional Office (Bolton Building), located in Biloxi, MS. The Env Lead will continue to serve in an environmental/planning/advisory/technical role to the MS SOSCs, MDEQ SCAT team members and the GCIMT and MS Branch Environmental Section staff.

3. SCAT TEAM REPRESENTATIVES

MDEQ will continue to provide the appropriate number of SCAT team State representatives to support DWH response activities. The level of staffing will be continuously evaluated to reflect the progressive decline in active shoreline segments and the completion of the Post Hurricane Season (PHS) Inspections.

ANNEX F: MISSISSIPPI DWH ORGANIZATION
GCIMT Phase III Response Activities Completion Plan**4. SERT TEAM REPRESENTATIVES**

MDEQ will continue to provide a State Emergency Response Team (SERT) member in each of the three (3) coastal counties for the duration of MS Phase III activities. It is projected that this level of staffing will continue throughout the response, until all MS impacted shoreline segments are deemed “removal actions are complete” and the Federal On Scene Coordinator (FOSC) determines MS Phase III removal efforts are complete under the NCP (40 CFR Part 300). SERT’s presence in each of the stated counties is vital in assisting the MS SOSCs with local government and citizen liaison activities, oversight of operational activities, monitoring/inspections of shoreline segments, and State representation in regard to attendance at MS Branch meetings, etc. It is anticipated that the SERT members’ duties will continue throughout the remainder of MS Phase III activities.

5. FORWARD OPERATING BASE (FOB)

The MS SCAT team members, SERT team members, and USCG GCIMT personnel will continue to be located at the State owned Bolton Building in Biloxi MS until “removal actions are complete” in accordance with the SCCP and the FOSC determines that MS Phase III removal efforts are complete. The State intends to transition the MS SOSCs presence to a local/Branch level role, initially based/located at the Bolton Building. Remote participation will require enhanced communication tools in accordance with Annex H, to support participants located at the Bolton Building and/or other remote locations.

6. Additional Support As-Needed

MS will continue to facilitate response objectives by providing staff to support additional requirements as needed to include but not limited to:

- a) Public information and external affairs support
- b) Information Technology (IT) support
- c) Administrative support

ANNEX G: LOUISIANA DWH ORGANIZATION
GCIMT Phase III Response Activities Completion Plan

- LOUISIANA ANNEX NOT SUBMITTED FOR INCLUSION IN THE PLAN -

ANNEX H: BATTLE RHYTHM AND INTERNAL COMMUNICATIONS
GCIMT Phase III Response Activities Completion Plan**1. OVERVIEW**

The strategies outlined are designed to ensure continuity, provide consistency and allow the GCIMT to continue to operate efficiently and effectively as it continues to transition to a decentralized organization.

2. PURPOSE

The purpose of this annex is to support a regular schedule of interaction and sharing of information between the FOSC, SOSCs, Federal trustees, and BP IC utilizing GCIMT established interface, reports and processes. The regular interaction and sharing of information is required to allow the GCIMT, at the direction of the FOSC, to operate as prescribed by the National Contingency Plan.

3. CONCEPT OF OPERATIONS

- a) Face-to-face meetings, conference calls, video conferencing and web-based meeting facilitation may be used in order to maintain real-time contact and live interaction between key decision makers. At the discretion of the FOSC, the regularly scheduled meetings that make up the Battle Rhythm will continue until Phase III activities cease and meetings are no longer deemed necessary. The Battle Rhythm will continue to be progressively adjusted as approved by the FOSC.
- b) SharePoint and Email will be the primary tools for the dissemination of information, sharing data and managing processes. Additionally a GIS visualization tool may be used.
- c) BP provided GCIMT offices will be utilized during the transition to a decentralized Incident Management Team (IMT). Meeting space and existing remote communication platforms will be made available as needed.
- d) Web conferencing tools may be used to support a decentralized GCIMT.
- e) Consistent communication and exchange of information will be essential for success.
- f) Operational conflicts will continue to be resolved by the FOSC/FOSCR as needed.
 - a. Approvals for both P&M Frequency Changes and for SIRs will be accomplished via email. Support packages will be sent via email; signature pages will be scanned and returned via email from the approvers

ANNEX H: BATTLE RHYTHM AND INTERNAL COMMUNICATIONS

GCIMT Phase III Response Activities Completion Plan

4. COMMUNICATION ASSURANCE

1. Requests for meetings outside the regular schedule shall be made through the Planning Section Chief. The FOSC is ultimately responsible for approving Unified Command communications, interface and the GCIMT Battle Rhythm.
2. The GCIMT will continue to use the existing processes established during the response to generate necessary reports and data. Key reports will continue to be evaluated for content/frequency based on information relevant to response activities. Reporting mechanisms required for the execution of the SCCP are listed in table 2.
3. Communications schedules & tools will be reviewed at regularly scheduled Command and General Staff meetings.

5. COMMUNICATION TOOLS

1. Meeting Facilitation
 - a. Face-to-Face (Wednesdays, New Orleans)
 - b. Video/Audio Conferencing (using existing capabilities)
 - c. Web Conferencing (Live Meeting)
2. Data Sharing/Process Management
 - a. Email
 - b. SharePoint - A GCIMT SharePoint site has been established to facilitate communications. SharePoint access will be provided to users as needed.

Table 1.0 Battle Rhythm – The following schedule will support the CGIMT Phase III Response Activities Completion Plan and is subject to change based on operational demands.

Battle Rhythm Element				
Name	Purpose	Proposed Frequency	Invitees	Type
Command and General Staff	Coordinate command staff function, responsibilities and objectives	Every Wed	Unified Command, SFTY, OSC, PSC, ENV	Conf. Call, face-to-face meeting or TelePresence
Segment Review Meetings	State by State review of segments progression and P&M frequencies	*1 st , 3 rd Wed	PLN, OPS, ENV, DOI, SOSC	Conf. Call, face-to-face meeting or TelePresence
Situation Update	Response Activities review	*1 st , 3 rd Wed	Command & General Staff	Conf. Call, face-to-face meeting or TelePresence
IAP Objectives Meeting	Describe incident strategy, objectives, command emphasis/priorities, and safety considerations for next operational period.	*2 nd Wed	Unified Command	Conf. Call, face-to-face meeting or TelePresence
IAP Tactics Meeting	Prepare tactical plan for upcoming operational period	*3 rd Wed	PSC, OSC, LSC, SFTY, ENV	Conf. Call, face-to-face meeting or TelePresence
IAP Planning Meeting	Command and General Staff to review and validate the operational plan as proposed by the Operations Section Chief.	*Last Wed	Unified Command, Command & General Staff, ENV, PLN	Conf. Call, face-to-face meeting or TelePresence

* All meetings on staggered Wednesday schedule will be integrated into Command and General Staff

Table 2.0 Key Reporting Mechanisms⁵

Reporting Mechanisms			
Name	Purpose	Initial Frequency	Communication Method
SCAT Segment Tracker	Status of segments as they move through PISTs, SIR inspections and SCAT monitoring.	Weekly	Email or SharePoint
Operations Segment Tracker	Portrays material collected and the frequency of visits.	Weekly	Email or SharePoint
General Response Objectives	High level objectives for the GCIMT	Monthly	Email
Situation Executive Summary	Status update	Weekly	Email
Open Action Tracker	Ongoing GCIMT activities	Weekly	Email
SCAT Report	Activities update	Weekly	Email
P&M Frequency Change Tracker	Progression of segments through the frequency change process.	Weekly	Email or SharePoint
SIR Approval Tracker	Progression of SIR sign-offs	Weekly	SharePoint

⁵ Frequencies and communication methods are subject to change based on GCIMT demands